

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL
ORIGINAL RECEIVED
JAN 17 1997
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Implementation of the Pay)
Telephone Reclassification and)
Compensation Provisions of the)
Telecommunications Act of 1996)

CC Docket No. 96-128

CC Docket No. 91-35

REPLY COMMENTS

MCI Telecommunications Corporation (MCI) hereby files reply comments in support of the comments filed by the AT&T Corp. (AT&T) and in support, in part, of the Comments filed by the American Public Communications Council (APCC) concerning Ameritech's comparably efficient interconnection (CEI) plan for the provision of payphone service.

In their comments, AT&T and APCC argue that Ameritech's plan concerning screening digits is not sufficient. Specifically, AT&T argues that Ameritech should provide details in its CEI plan on the types of codes it will use to identify Ameritech payphones and the payphones of non-affiliated providers. AT&T further argues that the codes should be transmitted for both coin line and non-coin line payphone service in order to prevent discrimination between users of the different services.¹

¹ AT&T Comments at 5-6.

No. of Copies rec'd
List ABCDE

024

APCC argues that Ameritech's plan concerning screening digits is discriminatory because Ameritech transmits a unique payphone screening digit-- "27"-- as part of automatic number identification (ANI) for its coin lines, however, the screening digit "07"-- which is not a unique payphone screening digit-- is provided in certain cases to payphone lines for independent payphone providers. According to APCC, the screening digit "07" is provided where Ameritech has not implemented "Flex ANI," which permits the transmission of the unique payphone coding digit "70", and where interexchange carriers have not subscribed to Flex ANI. APCC asks the Commission to order Ameritech to provide payphone providers with a screening code that uniquely identifies their lines as payphone lines. Further, APCC states that "[u]nless IXC's are required to subscribe to the Flex ANI code in all areas, Ameritech must be required to reconfigure the existing codes, that are universally available with access services to which IXC's do subscribe, so that a unique code is available for COCOT lines as well as coin lines."²

The provision of screening digits in the manner proposed by Ameritech places non-Ameritech payphones in a discriminatory position with respect to Ameritech's coin-line payphones. On its coin-lines, Ameritech currently provides the coding digit "27" as part of ANI II -- not Flex-ANI--and, therefore, it is transmitted with the ANI on all calls as part of access service. No additional service must be ordered and no additional charge must be paid to receive this coding digit. Thus, to ensure comparable service for all payphone providers, Ameritech must be required to provide a unique payphone coding digit for payphone lines, coin and non-coin, as part of ANI and at no additional charge.

² APCC Comments at 17.

In addition, Ameritech's plan is not in compliance with the Commission's payphone orders. In the Order on Reconsideration, the Commission required local exchange carriers (LECs) to make available to payphone service providers (PSPs) coding digits as a part of ANI that specifically identify a phone as a payphone and "not merely a restricted line."³ The Commission further required payphones to transmit the specific coding digits as a part of their ANI in order to be eligible for per-call compensation once it becomes effective.⁴ Payphones that do not transmit the specific coding digits as a part of their ANI will not be eligible for per-call compensation.

The coding digit "07"-- the digit Ameritech intends to provide to PSPs as a part of ANI for payphones from central offices that do not offer Flex ANI and where IXC's do not subscribe to Flex ANI-- is not a specific payphone digit. Rather, it merely indicates a restricted line, in direct violation of the Commission's Order on Reconsideration. Thus, in these cases, PSPs purchasing payphone service from Ameritech will only be able to transmit the coding digit "07" and, therefore, they will not be eligible for compensation. Accordingly, the Commission must require Ameritech to amend its CEI plan to demonstrate how it will provide a specific payphone coding digit to PSPs for all payphone service as a part of ANI, and on the same terms and conditions as it provides "27" today for its coin-lines.

³ Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996, Order on Reconsideration, CC Docket No. 96-128, 91-35, FCC 96-439, at para. 64, released November 8, 1996.

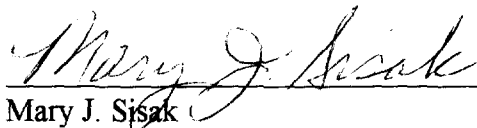
⁴ Id., The Reconsideration Order clearly places the obligation to transmit payphone coding digits on PSPs. Thus, contrary to the suggestion in APCC's filing, IXC's are not required to subscribe to Flex ANI to ensure the transmission of coding digits.

Based on the foregoing, MCI respectfully requests that the Commission reject Ameritech's CEI plan and require it to be refiled with the modifications specified herein.

Respectfully submitted,

MCI TELECOMMUNICATIONS CORPORATION

By:

A handwritten signature in cursive script, appearing to read "Mary J. Sisak", is written over a horizontal line.

Mary J. Sisak

Mary L. Brown

1801 Pennsylvania Avenue, N.W.

Washington, DC 20006

(202) 887-2605

Dated: January 17, 1997

CERTIFICATE OF SERVICE

I, Sylvia Chukwuocha, do hereby certify that copies of the foregoing Reply Comments were sent via first class mail, postage paid, to the following on the 17th of January, 1997.

Frank Michael Panek
Ameritech
Room 4H84
2000 West Ameritech Center Drive
Hoffman Estates, IL 60196-1025

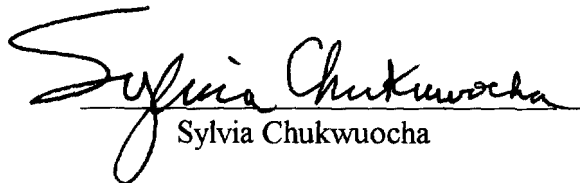
Albert H. Kramer
Robert F. Aldrich
Dickstein Shapior Morin
& Oshinsky LLP
2101 L Street, N.W.
Washington, DC 20037-1526

Ava B. Kleinman
AT&T Corp.
295 North Maple Avenue
Room 3252J1
Basking Ridge, New Jersey 07920

Henry T. Kelly
O'Keefe, Ashenden, Lyons and Ward
30 North LaSalle Street, Suite 4100
Chicago, IL 60602

Janice Myles
Common Carrier Bureau
Federal Communications Commission
Room 544
1919 M Street, N.W.
Washington, DC 20554

International Transcription Service
Federal Communications Commission
Room 246
1919 M Street, N.W.
Washington, DC 20554


Sylvia Chukwuocha